



July 9, 2021

VIA EMAIL

Roers Companies
c/o: Mr. Shane LaFave
shane@roerscompanies.com
110 Cheshire Lane
Suite 120
Minnetonka, MN 55305

Subject: Technical Assistance Provided – Review of Remedial Action Design Plan
Community Within the Corridor – West Block
3212 W Center St., 2727 N 32nd St., & 2758 N 33rd St., Milwaukee, WI
BRRTS #: 02-41-587376, FID #: 341333190

Dear Mr. LaFave:

On July 6, 2021, the Wisconsin Department of Natural Resources (DNR) received *Proposed Modification of Remedial Action Plan / Vapor Mitigation System* (the Report) with a Technical Assistance fee of \$700 for DNR review and response for the above-referenced site. The Report was prepared on your behalf by K. Singh & Associates, Inc. (K. Singh). The Report was submitted in response to the DNR's *Technical Assistance Provided* letter, dated June 1, 2021. The DNR reviewed the Report for regulatory compliance with Wis. Admin. Code chs. NR 722 and NR 724, and grants a conceptual approval of the remedial action design plan and provides you with recommendations and feedback pertaining to the plan, as detailed below.

Summary of Remedial Action Design Plan

The Report presents additional information and revisions in response to the remedial action review portion of the June 1, 2021, DNR letter. More specifically, the Report includes an expanded vapor mitigation system (VMS) design to include the entire building footprint for buildings 7, 8A and 8B. The purpose of the VMS is to mitigate vapors in the building through sub-slab depressurization. K. Singh plans to perform additional sub-slab vapor sampling in the basement areas (including building 8A) and in buildings 4, 5 and 6 in Summer 2021 and in Winter 2021/2022, after the heating system is active, to further investigate the vapor intrusion pathway and to help to verify the necessary extent of the VMS throughout the entire site building.

Additionally, the report presents a plan to perform a remedial soil excavation to reduce the mass and concentration of the identified contamination in building 7 in the vicinity of soil sample location WB-Int-7, which identified the highest known concentration of tetrachloroethylene (PCE) in the soils at this site. The area of excavation will encompass approximately 930 square feet and K. Singh estimates that 0.54 pounds of tetrachloroethylene (PCE) will be removed as a result of the excavation. The Report indicates that the soil will be excavated to approximately 6 inches below ground surface and will be replaced with granular fill, which may help to accentuate the effectiveness of the VMS.

Review of Remedial Action Design Plan

Based on the DNR's review of the updated remedial action design plan, as presented in the Report, the DNR provides the following recommendations and feedback:

I. Remedial Action

- a. The DNR recommends vertically expanding the area of proposed remedial soil excavation in building 7, as this will increase the likelihood that a greater amount of mass and concentration of contamination is removed.
- b. The soil that is excavated from this site must be properly characterized for disposal, per the Wis. Admin. Code NR 600 code series.
- c. The DNR concurs that confirmation samples should be collected during the remedial soil excavation to help to define the extent and degree of soil contamination beneath building 7.
- d. On June 15, 2021, the DNR received *Soil Quality Summary*, prepared by K. Singh on your behalf, which presents soil data that was collected in May 2021. This document indicates that one soil probe will be advanced in buildings 4, 7 and 8A to approximately 10 ft bgs to help to define the vertical extent of soil contaminated with chlorinated volatile organic compounds (CVOCs) beneath these buildings. Furthermore, this document indicates that two exterior soil probes will be performed adjacent to building 7 to approximately 10 ft bgs to help to define the vertical extent of soil contaminated CVOC impacts adjacent to building 7. The DNR concurs with this plan and recommends the following:
 - i. Additional soil sample locations should be considered within the area of the remedial soil excavation in building 7 and the area of the wood floor removal in building 8A, as these areas will be more assessible for sampling during these remediation and redevelopment activities.
 - ii. The proposed soil samples within the building footprint should be analyzed for polychlorinated biphenyls (PCBs) in addition to CVOCs, considering PCBs exceeding their applicable Wis. Admin. Code ch. NR 720 residual contaminant levels have been identified to be widespread within the shallow soils beneath the building footprint.

II. Mitigation

- a. The DNR concurs with the sub-slab vapor sampling plan presented in the Report. The extent of the VMS within the site building must be re-evaluated to consider the additional sub-slab vapor data and must be expanded, as applicable. As you evaluate the additional sub-slab vapor data, please note that, because there will be a childcare facility inside of building 4, the applicable vapor exposure scenario for building 4 is the residential vapor exposure scenario.
- b. Based on recent phone conversations between the DNR and K. Singh, the DNR understands that K. Singh is considering installing a 10-mil vapor barrier in select locations beneath the site building instead of the 50-mil barrier that is proposed in the Report. The DNR recommends that K. Singh install a more protective vapor barrier than a 10-mil vapor barrier. Additionally, the vapor barrier should be sealed to the foundation features, any utility piercing, and all elevator or

stairwell pits or sumps of the building to promote the effectiveness of the barrier. All seals should be tested in an appropriate manner to assure seals are properly performing.

Next Steps

In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.14, submit all sampling results within 10 days (on appropriately formatted tables) of receiving laboratory data.
- Per Wis. Admin. Code § NR 724.11, submit a commissioning plan that includes a robust indoor air sampling plan to demonstrate that vapor action levels are not exceeded in the indoor air, per Wis. Admin. Code § NR 726.05(4). You may reference RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, for commissioning guidelines. Submit the applicable review fee if you would like to request DNR review of and response to the commissioning plan.
- Per Wis. Admin. Code § NR 724.13, submit an operation and maintenance plan following the implementation of the remedial actions.
- Per Wis. Admin. Code § NR 724.15, submit a construction documentation or as-built report within 60 days after the date that construction of the remedial action is completed or determined to be essentially complete by the DNR. This report should include documentation of the commissioning of the system.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions concerning this site or this letter, please contact me, the DNR Project Manager, at (414) 435-8021, or by email at jane.pfeiffer@wisconsin.gov.

Sincerely,



Jane K. Pfeiffer
Project Manager – Hydrogeologist
Remediation & Redevelopment Program

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